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UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Angela Ross,

DEBTOR(S)

CASE NO.: 15-06832-dd
CHAPTER: 13

NOTICE OF MOTION/
APPLICATION AND
OPPORTUNITY FOR HEARING

TAKE NOTICE that (Movant) filed a Motion to Extend Time to File a Complaint to Determine Dischargeability of Certain Debts (the "Motion") with the United States Bankruptcy Court seeking an extension of time in which to file a complaint to determine dischargeability of certain debts by Federal Rule of Bankruptcy Procedure 4004(b) and 9006(b)(1)(1). The Motion requests that the Court extend such period through and including March 4, 2015.

A copy of the motion and proposed order accompanies this notice.

TAKE FURTHER NOTICE that any response, return, and/or objection to this motion should be filed with the Court no later than fourteen (14) days from service of motion and a copy simultaneously served on all parties in interest.

TAKE FURTHER NOTICE that no hearing will be held on this motion, except at the direction of the judge, unless a response, return, and/or objection is timely filed and served, in which case the Court will conduct a hearing on February 1, 2016, at 10:00 a.m., at 1100 Laurel Street, Columbia, South Carolina. No further notice of this hearing will be given.

Date: January 6, 2016

/s/ Trey McLeod
E.B. "Trey" McLeod, III
S.C. Dept. of Employment & Workforce
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Columbia, South Carolina 29202
(803) 737-3043
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DSC #10838

CERTIFICATE OF SERVICE

The above signing parties certify that the foregoing Notice and Motion was served on all creditors and parties in interest entitled to such notice on the above stated date.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF SOUTH CAROLINA

www.scb.uscourts.gov

IN RE:

Angela Ross,

DEBTOR(S)

CASE NO.: 15-06832-dd

CHAPTER: 13

MOTION TO EXTEND TIME TO OBJECT
TO DISCHARGE/DISCHARGEABILITY

COMES NOW the South Carolina Department of Employment and Workforce (“Creditor”), through its undersigned attorney, and for its Motion to Extend Time to Object to Discharge/Dischargeability, states to the Court as follows:

1. Angela Ross (“Debtor”) filed her Voluntary Petition for Relief under Chapter 13 of the United States Bankruptcy Code [“the Code”] on September 27, 2015.

2. Creditor currently is investigating potential false pretenses, false representations, or actual fraud in this case and does not wish to waive its rights, or the rights of the United States Trustee and any other creditors or parties in interest, regarding denial of the Debtor’s discharge or the dischargeability of any debts in this matter until due diligence is completed.

3. The deadline to file a complaint to determine the dischargeability of the Debtor’s debts or to oppose the Debtor’s discharge in this case is January 4, 2016.

4. Federal Rule of Bankruptcy Procedure 4004(b) and 9006(b)(1)(1) permits this Court to extend the time for the filing of a complaint to determine discharge for cause, upon request, as long as that request is filed before the expiration of the time period allotted for the filing of a complaint regarding discharge or determine dischargeability of debts under 11 U.S.C. § 523.

5. The time period for the filing of a complaint objecting to discharge has not expired as of the date and time of the filing of this Motion.

6. At this time, Creditor requests an additional sixty (60) days from January 4, 2016, the present discharge date, to and through March 4, 2016, for its objections to discharge and dischargeability with the understanding that further extensions may be required.

WHEREFORE, Creditor respectfully requests that this Court extend the deadline for it to object to the Debtor's discharge and dischargeability herein through March 4, 2016, and grant such other and further relief as this Court may deem just and proper.

Respectfully submitted,

/s/ Trey McLeod
E.B. "Trey" McLeod, III (DSC #10838)
S.C. Dept. of Employment & Workforce
Post Office Box 8597
Columbia, South Carolina 29202
(803) 737-3043
tmcleod@dew.sc.gov

Date: January 6, 2016

Counsel for Creditor

CERTIFICATE OF SERVICE

The above signing parties certify that the foregoing Notice, and Motion was served on all creditors and parties in interest entitled to such notice on the above stated date.